

EXHIBIT AA

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UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF NEVADA

LUCERO SANCHEZ,)
Plaintiff,)
vs.) Case No.:
RENOWN HEALTH, a Nevada Non-Profit) 3:21-cv-00352-MMD-WGC
Corporation, and DOES 1-20, inclusive,)
Defendant.)
_____)

RECORDED DEPOSITION OF RHONDA TU
Taken on October 24, 2022
At 2:58 p.m.
750 Sandhill Road, Suite 120
Reno, Nevada 89521

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1 months, right?

2 A. Uh-huh.

3 Q. Okay. During that time period, my client
4 would show you her medical records, indicating what she
5 was able and not able to do at work, right?

6 A. Uh-huh.

7 Q. Okay. Did you comply with those requests
8 from her doctor?

9 A. Yes.

10 Q. Okay. Did my client ever tell you there was
11 things she couldn't do or -- or -- or could do based on
12 what the doctor had said?

13 A. She didn't discuss it with me, but I read the
14 documentation, the restriction.

15 Q. Okay.

16 A. So we complied with providing her a -- a bar
17 stool for her to -- in order to sit down to do mostly
18 cashiering.

19 Q. Okay. So who -- who asked you to provide the
20 bar stool?

21 A. I think my supervisor.

22 Q. And who would that be?

23 A. Justin.

24 Q. Okay. Just a minute ago, I think you
25 indicated that, when my client gave you the doctor's

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1 CERTIFICATE OF RECORDER

2 STATE OF NEVADA)

3)

4)

5

6 NAME OF CASE: LUCERO SANCHEZ, PLAINTIFF VS

7 RENOWN HEALTH, DEFENDANT

8

9 I, Rachael Brown, a duly commissioned Notary Public,
10 authorized to administer oaths or affirmations in the State of
11 Nevada, do hereby certify: That I recorded the foregoing
12 deposition of the witness, Rhonda Tu October 24, 2022.

13 That prior to being examined, the witness was duly sworn to
14 testify to the truth. That deposition was recorded via audio and
15 video pursuant to NRCP30(b)(3) and said deposition recording is a
16 complete, true, and accurate recording of deposition testimony.
17 A transcript was created by E-Depositions LLC to aid the audio video
18 recording. A review of the deposition [] was [X] was not
19 requested by the deponent and [] was [X] was not requested by a
20 party of the action. If a review was requested, any changes
21 communicated to me by the deponent during the period allowed are
22 appended hereto.

23 I further certify that I am not a relative or employee of
24 an attorney or counsel of any of the parties, nor a relative or
25 employee of an attorney or counsel involved in said action, nor

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1 a person financially interested in the action.

2 IN WITNESS WHEREOF, I have hereunto set my hand in the City
3 of Reno.

4

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7 Rachael Brown

8 Notary Public

9 Appointment No. 22-1620-02

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